



"LIGHT, D MICHAEL" <DMLIGH@solutia.com> on 03/06/2001 10:09:00 AM

To: KEVIN TURNER
Subject: RE: Sauget Area I - Sediments Removal TCRAWP

EPA Region 5 Records Ctr.



226618

Kevin,

Pursuant to our follow-up phone conversation today, March 6, 2001, concerning the extent of the approval below for the Sauget Area I Sediments Containment Cell Time Critical Removal Action Plan (TCRAWP) and the Containment Cell Design,

it is my understanding that the Containment Cell Design is fully approved. The only potential outstanding issues remaining have to do with the forthcoming final revisions to the TCRAWP which are agreed to, and which simply need to be accurately and completely incorporated into the final document by Solutia, and submitted to the Agencies for final review/approval.

We also discussed the following statement in the approval letter below:

"...a final approval letter on U. S. EPA letterhead will be forthcoming.

Actual construction of the containment cell is not permitted until such approval is received."

According to the projected timeline delineated in the letter below, "final approval" will most likely not occur before late April/early May. The Agency and

Solutia agree that in order to meet the very aggressive project schedule required to complete cell closure before winter weather impacts become insurmountable, site mobilization and site preparation activities will necessarily take place prior to "final approval". Mobilization is expected to begin by April 1 and site prep work will start shortly thereafter. Solutia will expedite delivery of the revised TCRAWP to accelerate "final approval".

With respect to the forthcoming "groundwater monitoring plan", Solutia is currently preparing this document. We are also currently reviewing our notes on

commitments relative to the timing for submission of the document, and will have

further dialogue on this matter shortly. Solutia will continue to work diligently to meet the Agencies' needs in preparation of this document and procuring any required preliminary baseline documentation.

Mike Light
Manager, Remedial Projects
Solutia Inc.

Reply Separator

Subject: Sauget Area I - Sediments Removal TCRAWP
Author: "Turner.Kevin@epamail.epa.gov" <SMTP:Turner.Kevin@epamail.epa.gov> at SOIGATEWAY
Date: 3/5/01 3:54 PM

The U.S. EPA, Illinois EPA, Illinois DNR and U.S. Fish and Wildlife Service

have completed their review of the Time Critical Removal Action Work Plan (TCRAWP) for the Dead Creek Sediment and Soil Removal Project. This project includes the construction of a TSCA compliant containment cell, the excavation of contaminated sediments/soils from Dead Creek and the placement of those sediments/soils into the constructed cell. The TCRAWP included both the design documents for the construction of the containment cell and the removal of the sediments/soils. The TCRAWP did not include a groundwater monitoring plan. Solutia is reminded of a October 10th and 11th face to face meeting where you committed to providing this monitoring plan 60 days prior to the construction of the containment cell and that the monitoring wells would be in place and sampled (one or two rounds) before any waste is placed in the cell.

As you are aware, there have been many meetings, telephone conversations and e-mails as part of the agencies review of the work plan. We have come to resolution on all of the Agency comments (minus the groundwater monitoring issue). Please incorporate all of the comments, and agreed upon revisions into a final draft document for the final agency review. Subject to the inclusion of all comments and agreed upon revisions and after a final review of the TCRAWP by the Agencies, a final approval letter on U.S. EPA letterhead will be forthcoming. Actual construction of the containment cell is not permitted until such approval is received.

Please submit the final draft TCRAWP to Rob Watson (IEPA), Mike Henry (IDNR), Kevin de la Bruere (U.S. F&WS) and myself by April 4th 2001. Be aware the Agencies will need three to four weeks to review the final draft TCRAWP.

Kevin Turner
U.S. EPA
(618) 997-0115

ps.....one minor comment. We were under the assumption that the downchute was to be riprap the entire length. The latest drawing show riprap only at the top and bottom?